UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)) No. 1:21-CR-143-ELR-CCB)
VICTOR HILL,)
Defendant.)

MOTION TO CONTINUE SELF-SURRENDER DATE

Defendant Victor Hill respectfully files this Motion to Continue his selfsurrender date until his Motion for Bond Pending Appeal (Dkt. 121) is resolved. In support of this Motion, Mr. Hill shows as follows:

- 1. After a jury trial, Mr. Hill was convicted of six counts of deprivation of rights under color of law in violation of 18 U.S.C. § 242. (Dkt. 94.) On March 15, 2023, the Court sentenced Mr. Hill to a term of imprisonment of 18 months. (Dkt. 113.) The Court allowed him to remain on bond and self-surrender to the U.S. Marshals Service at a later-appointed time.
- 2. Even though this Court recommended that Mr. Hill be designated to FPC Montgomery "or to a minimum-security camp in order to minimize any danger that may come to him based on his status as a former law

- enforcement officer" (Dkt. 113 at 3), the Bureau of Prisons designated him to FCI Forrest City Low in Arkansas, which does not have a camp, on April 11, 2023. (Dkt. 120.)
- 3. Contemporaneous with this motion, Mr. Hill has filed a Motion for Bond Pending Appeal on the grounds that he will raise substantial questions on appeal that could result in a reversal of his conviction and that there is a very real possibility that he would have completely served his sentence if that appeal comes out his way. (Dkt. 121)
- 4. This Motion seeks to continue Mr. Hill's self-surrender date until this Court (and the Eleventh Circuit, if necessary) resolve his request to remain on bond while his appeal is pending in the event his sentence is obviated by a favorable result on appeal.

WHEREFORE, Mr. Hill respectfully requests that the Court continue his self-surrender date until his Motion for Bond Pending Appeal has reached final resolution.

This 12th day of April, 2023.

Respectfully submitted,

By:/s/ Lynsey M. Barron

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Attorneys for Victor Hill

CERTIFICATE OF SERVICE

I hereby certify that on the below date I electronically filed the foregoing Motion to Continue Self-Surrender Date with the Clerk of Court using CM/ECF system which will automatically send email notification of such filing to the to the following attorneys of record.

This 12th day of April, 2023.

/s/Lynsey M. Barron

By: Lynsey M. Barron Ga. Bar No. 661005

Attorney for Victor Hill